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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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December 21, 1990

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The Honorable James D. Watkins
Secretary of Energy
Washington, DC 20585

Dear Mr. Secretary:

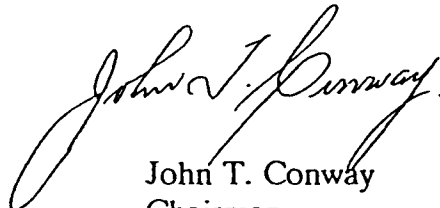
The Board has followed with interest your moves to implement major changes in the Department of Energy (DOE) occurrence reporting system, beginning with your Notice (SEN-11-89) of September 5, 1989, calling for a major overhaul of the reporting system, and followed by the issuing of DOE Order 5000.3A, "Occurrence Reporting and Processing of Operations Information" on May 30, 1990. That Order called for implementation of a revised occurrence reporting system by August 30, 1990. The Board has continued to review the implementation of the new occurrence reporting system at DOE Defense Nuclear Facilities. While the Board believes that DOE Order 5000.3A can provide the framework for an effective system, the Board does not believe that it is being effectively implemented. In this regard, the Board has developed several areas of concern about the implementation of the revised occurrence reporting system which are cited below.

- Follow-up through analysis of events, determination of corrective actions, and preparation and dissemination of reports is not timely.
- Analyses of events are not sufficient to ensure in-depth analyses of the root causes, to permit useful trend analyses, and to identify appropriate and comprehensive corrective action.
- Occurrence reports are not suitably comprehensive nor of sufficient detail to permit an adequate assessment of the rationale and appropriate corrective actions by line management.
- Corrective actions are not tracked closely enough to ensure their timely completion, and there are no provisions for independent verification that corrective action has been completed.
- High priority occurrence reports do not receive attention commensurate with their safety implications.
- The occurrence reports are not technically screened and compiled to: (1) develop general and specific lessons-learned for distribution to and use by all DOE nuclear facilities; and (2) assess DOE-wide problems and implement DOE-wide solutions where appropriate.

Based on these initial concerns, the Board requests that DOE provide the Board with the following:

- A briefing by the Assistant Secretary for Nuclear Energy (NE-1) on the implementation of DOE Order 5000.3A with particular emphasis on the Assistant Secretary's responsibilities as cited in paragraph 9.a of the Order. The briefing should also identify what actions are being taken by line management (DOE Headquarters, Field Offices, and contractor organizations) to ensure that priority attention is given to occurrence reports.
- The procedures, as required by paragraph 8.d of DOE Order 5000.3A, established by the Program Senior Officials for implementing the requirements of DOE Order 5000.3A for the defense nuclear facilities listed below:
 - Savannah River Site: K, L, and P Reactors;
 - Rocky Flats Plant: Buildings 371, 374, 559, 707, 771, 774, 776, 777, and 779;
 - Hanford Site: Plutonium Finishing Plant; Reprocessing Facility, together with associated waste processing and storage facilities; N-Reactor (including decommissioning), and K-Reactor Storage Basins;
 - Waste Isolation Pilot Plant;
 - Y-12; and
 - Idaho Chemical Processing Plant.
- A briefing by the Director, Office of Nuclear Safety (NS-1), on DOE line management implementation of DOE Order 5000.3A with particular emphasis on the Director's responsibilities as cited in paragraph 9.b of the Order.

Sincerely,



John T. Conway
Chairman

cc:

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All Board Members
Andy Andersen/OGC
G.W. Cunningham/TOM
K.M. Pusateri/OGM
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